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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

) Case No. CV 85-4544 DMG (AGR^{xx}_{SEP})

Plaintiffs,

) APPLICATION FOR LEAVE TO FILE

- vs -

) MOTION TO ENFORCE SETTLEMENT AND

WILLIAM P. BARR, ATTORNEY GENERAL
OF THE UNITED STATES, *et al.*,

) EXHIBITS IDENTIFYING CLASS MEMBER

Defendants.

) ASYLUM APPLICANTS AND GOVERNMENT

) EMPLOYEES UNDER SEAL; DECLARATION

) OF CLASS COUNSEL

)

) [HON. DOLLY M. GEE]

1 *Plaintiffs' counsel, continued:*

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1 This is an application seeking leave to file in the public record the Declarations
2 of asylum seekers, Plaintiffs' Motion to Enforce, and Memorandum in Support of
3 Plaintiffs' Motion to Enforce the Settlement identifying such asylum seekers with
4 identifying information redacted so as to protect the identities of applicants for asylum.
5
6 Pursuant to 8 C.F.R. §§208.6 and 1208.6 the identities of asylum applicants are
7 confidential. Defendants have agreed that all filing containing personal identifying
8 information regarding class members or their parents may be filed under seal in this
9 case. Plaintiffs also seek to redact identifying information to protect the identities of
10 certain Government employees.
11
12

13 Exhibit declarations have been gathered from class members up to and including
14 Friday March 29, 2019. See Declaration of Peter Schey filed herewith.
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A proposed Order granting this application is lodged herewith.

17 Dated: May 31, 2019

Respectfully submitted,

18 CENTER FOR HUMAN RIGHTS &
19 CONSTITUTIONAL LAW
20 Peter A. Schey
21 Carlos Holguín
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7 Of counsel:

8 YOUTH LAW CENTER
9 Virginia Corrigan

10 /s/*Peter Schey*
11 *Attorneys for Plaintiffs*

12 / / /

1 CERTIFICATE OF SERVICE
2

3 I, Peter Schey, declare and say as follows:
4

5 I am over the age of eighteen years of age and am a party to this action. I am
6 employed in the County of Los Angeles, State of California. My business address is
7 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state. ^[L] ~~SEP~~

8 On May 31, 2019, I electronically filed the following document(s):
9

10 • APPLICATION FOR LEAVE TO FILE MOTION TO ENFORCE SETTLEMENT AND
11 EXHIBITS IDENTIFYING CLASS MEMBER ASYLUM APPLICANTS AND GOVERNMENT
12 EMPLOYEES UNDER SEAL

13 with the United States District Court, Central District of California by using the
14 CM/ECF system. Participants in the case who are registered CM/ECF users will be
15 served by the CM/ECF system.

16 */s/Peter Schey
17 Attorney for Plaintiffs*